



South Coast
Air Quality Management District

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FAXED: JUNE 28, 2007

June 28, 2007

Mr. Ronald J. Kosinski
Department of Transportation, Caltrans District 7
Division of Environmental Planning
100 South Main Street MS-16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Draft Environmental Impact Report (DEIR/S)
Interstate 405 Sepulveda Pass Widening Project (EA 120300)
(May 2007)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report/Statement.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report/Statement. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith., Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment
SS: CB

LAC070525-01
Control Number

Draft Environmental Impact Report (DEIR/S)
Interstate 405 Sepulveda Pass Widening Project

1. Project Construction Emissions:

The lead agency states on page 199 of the DEIR/S that construction activities associated with the build alternatives of the proposed project would be temporary, and that a qualitative construction emissions analysis has concluded that project construction would not create adverse pollutant emissions. SCAQMD staff has two comments relating to these statements by the lead agency.

First, regarding construction emissions being temporary and therefore being less than significant, please note that designations of nonattainment are based on daily exceedances of an ambient air quality standard. Consequently, whether or not emissions are temporary is irrelevant to determining air quality significance.

Further, Please note that without quantifying the proposed project's construction air quality impacts and the effectiveness of measures to mitigate these impacts, the lead agency has not demonstrated that the construction emissions are not significant. Given the number and type of construction equipment listed on page 199 that would be used in the construction of the proposed project, it is important to estimate the emissions from these sources in order to determine whether or not the construction emissions will be significant.

On page 200 of the DEIR/S the lead agency further states that some asphalt concrete pavement and curbs and gutters would be removed. The lead agency does not provide the volume of the demolition debris that would have to be moved and the number of truck trips that would be involved and the distances that would be covered to dispose of the debris. All this data needs to be provided to also account for the emissions that would be generated from the activities leading to the proposed project's construction.

To calculate potential adverse construction air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use the emissions calculation methodologies in the 1993 SCAQMD CEQA Air Quality Handbook. It may be possible to calculate construction emissions for this project using the current version of the URBEMIS 2007, which is available on the following website: www.urbemis.com. If quantification of emissions reveals that project emissions exceed the established significance thresholds, then the lead agency is required to identify mitigation measures to reduce those emissions to the maximum extent feasible.

2. Localized Impacts (Significance Thresholds) Analysis

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. SCAQMD staff recommends that for this project and for all future projects, the lead agency undertake the localized analysis to ensure that all feasible

measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.